

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

LOUIS G. GRAYSON,
Plaintiff,

V.

**MATTHEW DeWITT,
PAUL THORNE,
CHRISTOPHER ROOSEN,
CHIEF WES KAHLEY,
CITY OF YORK,
JEFFREY LEER
JOHN C. SHAPLEY, III,
CHIEF THOMAS HYERS,
SPRINGETTSBURY TOWNSHIP,
Defendants.**

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 : NO.: 1:15-cv-00453
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 : JUDGE JONES
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 : CIVIL ACTION - LAW
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 : JURY TRIAL DEMANDED
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**UNOPPOSED MOTION FOR ENLARGEMENT OF TIME
TO COMPLETE DISCOVERY**

AND NOW, comes Plaintiff Louis G. Grayson, by and through his attorney, Alina M. Dusharm, Esq. at Trinity Law, PC, and submits this Unopposed Motion for Enlargement of Time to Complete Discovery, and in support thereof, states as follows:

1. The initial Complaint in this action was filed on March 4, 2015.
2. Thereafter, Plaintiff filed amended complaint on May 29, 2015.
3. This case is currently scheduled on the May 2016 trial list.

4. All parties engaged in discovery in good faith, but have not been able to complete all depositions because of numerous scheduling conflicts.

5. Additionally, the parties are awaiting disposition of Defendant York City's Motion to Dismiss, Springettsbury Township's Motion to Dismiss, and Plaintiff's Motion for Leave to Amend Complaint.

6. Plaintiff and Defendants, together, have approximately seven or eight remaining depositions to complete before the fact discovery deadline on November 30, 2015.

7. Plaintiff's counsel is scheduled for maternity leave beginning on or before, October 1, 2015, and will not be returning until approximately December 15, 2014.

8. Plaintiff and Defendants are working to schedule the remaining depositions in the beginning of January, 2016. The parties currently have the following dates set aside for depositions: January 6-7, 2016, and January 12-14, 2016.

9. In order to facilitate scheduling between all parties for the remaining depositions, and for Plaintiff's counsel to be able to participate in the remaining discovery, Plaintiff is seeking an enlargement of time to complete the remaining fact discovery, until January 29, 2016.

10. All remaining deadlines can be postponed accordingly.

11. Plaintiff has conferred with counsel for all Defendants in this matter, and they have indicated their concurrence with this request.

12. This enlargement of time should not unduly delay disposition of the case and it is not prejudicial to the parties.

WHEREFORE, Plaintiff respectfully requests that the Court grant Plaintiff's request for extension of the discovery deadline until January 29, 2016.

DATE: September 29, 2015

TRINITY LAW, P.C.

/s/ Alina M. Dusharm
Alina M. Dusharm, Esquire
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CERTIFICATE OF SERVICE

I, Alina M. Dusharm, Esq., of Trinity Law have this day served a copy of the Unopposed Motion for Enlargement of Time to Complete Discovery on the person(s) indicated below through the Middle District Electronic Filing System:

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Rolf E. Kroll
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DATE: September 29, 2015

TRINITY LAW, P.C.

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